

ALLTEL CORPORATION

655 15th Street N.W.
Suite 220
Washington, DC 20005

202-783-3970
202-783-3982 fax

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RECEIVED

May 13, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

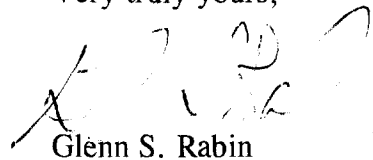
Re: Implementation of the Telecommunications Act of 1996;
Telecommunications Carriers' Use of
Customer Proprietary Network Information and
Other Customer Information
CC Docket No. 96-115

Dear Ms. Salas:

Enclosed for filing on behalf of ALLTEL Communications, Inc. please find an original and twelve (12) copies of its Reply Comments in connection with the above-referenced matter.

Please address any questions respecting this matter to the undersigned counsel.

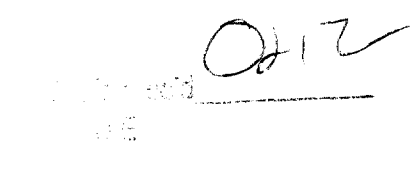
Very truly yours,


Glenn S. Rabin

GSR/ss

Enclosures

cc: (w/encl.)
International Transcription Service, Inc.
Janice M. Myles



Before the
Federal Communications Commission
Washington, D.C. 20554

APR 10 1998

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| In the Matter of |) | |
| |) | |
| |) | |
| Implementation of the |) | |
| Telecommunications Act of 1996: |) | CC Docket No. 96-115 |
| |) | |
| Telecommunications Carriers' Use |) | |
| of Customer Proprietary Network |) | |
| Information and Other Customer |) | |
| Information |) | |

Reply Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc.¹ ("ALLTEL") hereby submits its reply comments in support of the Request for Deferral and Clarification filed on April 24, 1998 in the above-referenced matter by the Cellular Telecommunications Industry Association² ("CTIA").

ALLTEL notes that virtually all of the comments support CTIA's petition seeking limited relief for CMRS carriers from certain of the Commission's CPNI

¹ ALLTEL Communications, Inc. is the subsidiary of ALLTEL Corporation through which CMRS, long distance, and other competitive telecommunications services are provided to subscribers. Other affiliates and subsidiaries of ALLTEL Corporation provide wireline local exchange services in various states.

² The Commission established the pleading cycle for comment on the CTIA petition as well as a petition and Motion for Stay filed by GTE Service Corporation in Public Notice, DA 98-836 (released May 1, 1998).

requirements pending reconsideration. The lone exception appears to be MCI which, while stating that it has no position on those aspects of the requested relief affecting CMRS providers, nonetheless strongly objects to the other relief requested by CTIA.³ The MCI comments do not specify the "other relief" for CMRS carriers which it finds objectionable, although it may be inferred that the objection relates to CTIA's request respecting the win-back rule.⁴ The portion of the MCI comments devoted to the win-back rule, however, is exclusively devoted to a familiar attack on the purported ILEC abuse of CPNI and not CMRS.⁵ Consequently, no reason has been offered by MCI as to why the CTIA request should not be granted in its entirety with respect to CMRS carriers.

The use of CPNI for win-back purposes provides a direct benefit to subscribers in the CMRS market, where carriers now compete on price. In essence, win-back programs permit the subscriber to engage CMRS competitors in a bidding war for the subscriber's business. There can be no greater embodiment of a competitive market place at work and no greater benefit to the consumer.

Many comments support both the CTIA and GTE requests, but argue, as does MCI, that relief should be accorded to all telecommunications carriers. While ALLTEL supports an across the board deferral or stay of the Second Report and Order's requirements, it nonetheless believes that the case for deferral of the rules for

³ See MCI Comments at page 1.

⁴ See MCI Comments at pages 12-15.

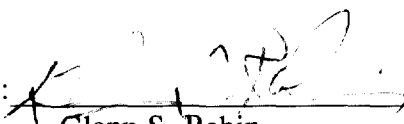
⁵ See MCI Comments at pages 12-15.

CMRS carriers is most compelling. As noted by many of those filing comments, the coupling of CPE (i.e. cell phones) and the underlying service has been a mainstay of cellular marketing since the industry's inception. Application of the rules as currently constituted would disrupt established carrier/customer relationships and impair the ability of a carrier to market CPE required for a subscriber's transition to digital service.

Although not widely noted in the comments, ALLTEL continues to believe that the 180 day deferral sought by CTIA should be tacked on to the existing eight month deferral of enforcement of the safeguard requirements. As noted in its comments, ALLTEL believes that additional time is required for carriers to develop, perfect and implement the CPNI safeguard systems now required by the Commission.⁶

Respectfully submitted,

ALLTEL Communications, Inc.

By: 
Glenn S. Rabin
Federal Regulatory Counsel

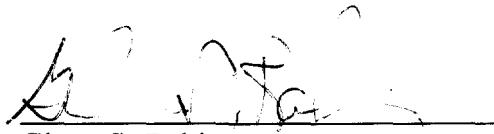
ALLTEL Corporate Services, Inc.
655 15th Street, N.W.
Suite 220
Washington, D.C. 20006
(202) 783-3976

Dated: May 13, 1998

⁶ See ALLTEL Comments at pages 3-4.

CERTIFICATE OF SERVICE

I, Glenn S. Rabin, do certify that on May 13, 1998 copies of the foregoing Reply Comments of ALLTEL Communications, Inc. were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


Glenn S. Rabin

Robert J Gryzmala
Counsel for SBC Communications, Inc.
One Bell Center
Room 3532
St. Louis, MO 63101

International Transcription Services
1231 20th Street
First Floor
Washington, DC 20036

Irwin A. Popowsky
Consumer Advocate
Office of Attorney General
1425 Strawberry Square
Harrisburg, PA 17120

Jackie Follis
Senior Policy Analyst
Public Utility Commission of Texas
7800 Shoal Creek Boulevard
Austin, TX 78757-1098

Saul Fisher
NYNEX Telephone Companies
1095 Avenue of the Americas
New York, NY 10036

Janice Myles
Federal Communications Commission
Common Carrier Bureau - 1919 M Street
Room 544
Washington, DC 20554

Anthony J. Genovesi
Legislative Office Bldg.
Room 456
Albany, NY 12248-0001

Charles H. Helein, General Counsel
Helein & Associates
Counsel for Americas Tele. Assoc.
8180 Greensboro Drive,
Suite 700
McLean, VA 22102

Kenneth Rust, Director
NYNEX Government Affairs
1300 I Street
Suite 400W
Washington, DC 20005

Theodore Case Whitehouse
Willkie, Farr & Gallagher
Counsel for Association of Directory Publishers
1155 21st Street, N.W.
Washington, DC 20036

David L. Meier, Director
Cincinnati Bell Telephone
201 E Fourth Street
Cincinnati, OH 45201-2301

Albert Halprin
Halprin, Temple, Goodman & Sugrue
Counsel for Yellow Pages Publishers Assoc.
1100 New York Avenue, NW
Suite 650E
Washington, DC 20005

Danny E. Adams
Kelley, Drye & Warren, L.L.P.
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036

Dennis C. Brown
Brown and Schwaninger
Small Business in Telecommunications
1835 K Street, N.W.
Suite 650
Washington, DC 20006

David A. Gross
Airtouch Communications, Inc.
1818 N Street, N.W.
Suite 800
Washington, DC 20036

Mark C. Rosenblum
AT&T Corporation
295 North Maple Avenue
Rom 324511
Basking Ridge, NJ 07920

Carl W. Northrop
Paul, Hastings, Janofsky & Walker
Counsel for Arch Communications Group
1299 Pennsylvania Avenue, NW
10th Floor
Washington, DC 20004-2400

Bradley Stillman
Counsel for Consumer Federal of America
1424 16th Street, N.W.
Suite 604
Washington, DC 20036

Randolph J. May
Sutherland, Asbill & Brennan
Counsel for Compuserve, Inc.
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004-2404

Andrew D. Lipman
Swidler & Berlin
Counsel for MFS Communications Co.
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Peter Arth, Jr./Mary Mac Adu
People of the State of California and
The Public Utilities Commission of the
State of California
505 Van Ness Avenue
San Francisco, CA 94102

Kathryn Marie Krause
US West, Inc.
1020 19th Street, N.W.
Suite 700
Washington, DC 20036

Judith St. Ledger-Roty
Reed, Smith, Shaw & McClay
1301 K Street, N.W.
Suite 1100 East Tower
Washington, DC 20005-3317

Mary McDermott
United States Telephone Association
1401 H Street, N.W.
Suite 600
Washington, DC 20005

Charles C. Hunter - Hunter & Mow PC
Counsel For Telecommunications Resellers Association
1620 I Street, N.W.
Suite 701
Washington, DC 20006

Lawrence W. Katz
The Bell Atlantic Telephone Companies
1320 North Court House Road
Eighth Floor
Arlington, VA 22201

Catherine R. Sloan
Worldcom, Inc.
d/b/a LDDS Worldcom
1120 Connecticut Avenue, N.W.
Suite 400
Washington, DC 20036

Cindy Z. Schonhaut, Vice President Government Affairs
Intelcom Group (USA) Inc.
9605 East Maroon Circle
Englewood, CO 80112

Michael S. Pabian
Ameritech
2000 West Ameritech Center Drive
RM 4H82
Hoffman Estates, IL 60196

Mark J. Golden
Vice President of Industry Affairs
Personal Communications Industry Association
500 Montgomery Street - Suite 700
Alexandria, VA 22314-1561

Ann P. Morton
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Albert H. Kramer/Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
American Public Communications Council
2101 L Street, N.W.
Washington, DC 20554

Richard McKenna
GTE Service Corporation
600 Hidden Ridge
Irving, Texas 75015

Teresa Marrero
Teleport Communications Group, Inc.
Senior Regulatory Counsel
One Teleport Drive
Suite 300
Staten Island NY 10310

J. Christopher Dance, V.P. - Legal Affairs
Excel Telecommunications, Inc.
Kerry Tassopoulos, Director of Government Affairs
9330 LBJ Freeway - Suite 1220
Dallas, Texas 75243
Joseph P. Markoski/Marc Berejka

M. Robert Sutherland/A. Kirven Gilbert III
BellSouth Corporation
1155 Peachtree Street, NE
Suite 1700
Atlanta, GA 30309-3610

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W.
Washington, DC 20036

Jay C. Keithley/Leon M. Kestenbaum
Michael B. Fingerhut
Sprint Corporation
1850 M Street, N.W.
11th Floor
Washington, DC 20036

Jonathan E. Canis
Reed, Smith, Shaw & McClay
1301 K Street, N.W.
Suite 1100 East Tower
Washington, D.C. 20005

Danny E. Adams/Steven A. Augustino
Kelley, Drye & Warren, L.L.P.
Counsel for Competitive Telecommunications Assoc.
1200 Nineteenth Street, N.W. - Suite 500
Washington, DC 20036

Michael J. Shortley, III
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Information Technology Association
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, DC 20044

Danny E. Adams/Steven A. Augustino
Kelley, Drye & Warren, L.L.P.
Counsel for Alarm Industry Comm. Committee
1200 Nineteenth Street, N.W. - Suite 500
Washington, DC 20036

Thomas K. Crowe
Law Offices of Thomas K. Crowe, P.C.
Counsel for Excel Telecommunications, Inc.
2300 M Street, N.W.
Suite 800
Washington, DC 20037

Frank W. Krogh
Donald J. Elardo
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

Jonathan E. Canis
Kelley, Drye & Warren, L.L.P.
Counsel for Intermedia Comm. Inc.
1200 Nineteenth Street, N.W.
Suite 500
Washington, DC 20036

Elizabeth H. McJimsey
Attorney for Sprint Spectrum, L.P.
d/b/a Sprint PCS
4900 Main Street
12th Floor
Kansas City, MO 64112

Genevieve Morelli, VP and General Counsel
Competitive Telecommunications Association
1140 Connecticut Avenue, N.W.
Suite 220
Washington, DC 20036

Philip L. Malet/James M. Talens
Steptoe & Johnson, L.L.P.
Counsel for Iridium North America
1330 Connecticut Avenue, N.W.
Washington, DC 20036

Paul Rodgers
General Counsel
1201 Constitutional Avenue
Suite 1102
Washington, DC 20044